

# **Exhibit E**



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February 10, 2023

VIA E-MAIL

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**RE:** *San Francisco Unified School District v. JUUL Labs, Inc., et al.* (Case No. 3:19-cv-08177) – Plaintiff’s Witness List

Dear Counsel:

Below please find Plaintiff San Francisco Unified School District’s most recent Witness List.

The “Video/Live” category includes witnesses whose availability for trial is uncertain or who, even if they are available to testify live, Plaintiff may nevertheless seek, by agreement or Court Order, to call by video. The “Call Status” column is Plaintiff’s good faith representation as to which witnesses it is more likely to call at trial, but these designations are subject to change as trial preparation progresses.

With production of this Witness List, Plaintiff reserves the right to:

- Call witnesses at trial, in its case-in-chief or otherwise, not included on this list, or to include additional or different witnesses on any future iteration of this list.
- Call witnesses at trial, in its case-in-chief live, identified on Altria’s as coming live in Altria’s case-in-chief (*ie.* those witnesses that Altria has subpoenaed).



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- Supplement or amend this list up to and including the time of trial in light of: discovery that has not yet been completed; the evidence Defendant elicits at trial; Defendant's proposed designations, exhibits, and witness lists; and/or the Court's ruling on any pretrial motions.
- Not call any person on this list.
- Call or introduce testimony from any witness deemed necessary for impeachment or rebuttal purposes, whether or not previously identified herein.
- Submit as evidence deposition or other testimony taken in this matter, regardless of whether or not from a witness identified herein.
- Rely upon deposition testimony affirmatively designated by Defendant or Plaintiff for any witness as counter-designated deposition testimony introduced in any party's case-in-chief.
- Call any witness (including witnesses not identified herein) to the extent necessary to support the admission of documents into evidence if a stipulation cannot be reached concerning the admissibility or authenticity of such documents.
- Use any available method at trial (*i.e.* live in-person testimony, live remote testimony, or deposition designation video), regardless of the classifications provided herein.

Please reach out with any questions or concerns.

Very truly yours,

Thomas P. Cartmell

TPC/mg

cc: Sarah London  
Dean Kawamoto  
Ellen Relkin  
Dena Sharp



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REF NO.	TYPE	WITNESS	CALL STATUS
<b>Live</b>			
1	Expert	Chandler, John	Likely Call
2	Expert	Cutler, David	Likely Call
3	Expert	Dorn, Michael	Likely Call
4	Expert	Drumwright, Minette	Likely Call
5	Expert	Grunberg, Neil	Likely Call
6	Expert	Ribisl, Kurt	Likely Call
7	Expert	Rollo, Robert	May Call
8	Expert	Shihadeh, Alan	May Call
9	Expert	Tackett, Randall	May Call
10	Expert (Abatement Phase)	Kelder, Steven	Likely Call
11	Expert (Abatement Phase)	Winickoff, Jonathan	Likely Call
12	Expert (Punitive Phase)	Johnson, Robert	Likely Call
13	Expert/Fact	Halpern-Felsher, Bonnie	Likely Call
14	Expert/Fact	Prochaska, Judith	Likely Call
15	Fact	Bowen, Adam	Likely Call
16	Fact	Cho, Madeline	Likely Call
17	Fact	Coates, Kim	May Call
18	Fact	Lehr-Love, Kaya	Likely Call
19	Fact	Lingrell, Erica	Likely Call
20	Fact	Pak, Quarry	Likely Call
21	Fact	Pepper, Christopher	Likely Call
22	Fact	Pritzker, Nicholas	Likely Call
<b>Video</b>			
23	Fact	Blaylock, Brian	Likely Call
24	Fact	Crosthwaite, Kevin ("K.C.")	Likely Call
25	Fact	Daviduke, Brian	May Call
26	Fact	Devitre, Dinyar	Likely Call
27	Fact	Dunlap, Scott	Likely Call
28	Fact	Edmonson-Taylor, Jessica	May Call
29	Fact	Fernandez, Pascal	May Call
30	Fact	Frankel, Zachary	Likely Call
31	Fact	Gardner, William	Likely Call
32	Fact	Gifford, William	Likely Call
33	Fact	Handelsman, Harold	May Call
34	Fact	Harter, Bruce	Likely Call



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35	Fact	Longest, Kaitlin	Likely Call
36	Fact	Mumby, Richard	May Call
37	Fact	Olin, Christopher	Likely Call
38	Fact	Romyak, Matthew	May Call
39	Fact	Valani, Riaz	Likely Call
40	Fact	Willard, Howard	Likely Call
41	Fact	Xu, James	Likely Call
<b>Video/Live</b>			
42	Fact	Garnick, Murray	Likely Call
43	Fact	Monsees, James	May Call
44	Fact	Wakefield, Camesheann	Likely Call